

ROSS
ARONSTAM
& MORITZ
LLP

1313 North Market Street, Suite 1001 • Wilmington, DE 19801

Telephone 302.576.1600 • Facsimile 302.576.1100

www.ramllp.com

Garrett B. Moritz

Direct Dial 302.576.1604

gmoritz@ramllp.com

March 25, 2025

VIA E-FILING

The Honorable Leonard P. Stark
U.S. Court of Appeals for the Federal Circuit
717 Madison Place, N.W.
Washington, D.C. 20439

Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela,*
CA No. 1:17-mc-00151-LPS

Dear Judge Stark:

This letter is respectfully submitted on behalf of Sale Process Parties Phillips Petroleum Company Venezuela Limited, ConocoPhillips Petrozuata B.V., ConocoPhillips Gulf of Paria B.V., and ConocoPhillips Hamaca B.V. (Plaintiffs in Cases No. 19-mc-00342-LPS, No. 22-mc-00264-LPS, and No. 22-mc-00464-LPS) (“ConocoPhillips”) in response to the *Venezuela Parties’ Opposition to Red Tree Investment LLC’s Motion to Seal* (D.I. 1610) (the “Opposition”).

ConocoPhillips takes no position regarding the motion to seal. It submits this letter to indicate its support for the positions taken by the Special Master in his letter to the Court of today’s date, and specifically to correct the record regarding certain statements made by the Venezuela Parties in their Opposition.

As an initial matter, ConocoPhillips had understood discussions among the Sale Process Parties and the Special Master to be confidential and is concerned by the Venezuela Parties’ breach of what has been, at a minimum, the parties’ tacit understanding. Without disclosing the details of those discussions, the fact is that, to the extent the Venezuela Parties’ statements refer to ConocoPhillips, both of the assertions are incorrect. ConocoPhillips will address these matters more fully at whatever time the Court deems them relevant.

The Honorable Leonard P. Stark

March 25, 2025

Page 2

The Venezuela Parties' breach of confidence and mischaracterization of past conversations raises a real concern that the Sale Process Parties and the Special Master can no longer have the sort of candid exchanges of views that ConocoPhillips believes have been productive and inured to the benefit of the sale process.

We sincerely appreciate the Court's continuing consideration of this matter.

Respectfully submitted,

/s/ Garrett B. Moritz

Garrett B. Moritz (Bar No. 5646)

cc: All Counsel of Record